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MAL DE VICH

April 19, 1993

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Office of the Secretary Federal Communications Commission Washington, D.C. 20554

Re: Policies and Rules Implementing the Telephone Disclosure and Dispute Resolution Act

Dear Commissioner's:

900 America is a service bureau and a re-seller of long distance service since 1989.

I'm very concerned about proposed rule making changes that could put this company out of business.

Only three carriers offer 900 numbers: AT&T, MCI, and Sprint for transport purposes. IXC's are shut out and must be able to explore other areas of billing for audiotext services.

Abuse is running rapid not only now by the consumer but also by AT&T and MCI toward the information provider where premium billing services are concerned. I'm all for protecting the public interest, however there is severe abuse by the carriers who change their policy overnight and IP's are put out in the cold and bankrupt. Termination of a program that are not in violation of any regulation or law can be and have been terminated with little or no notice. The carrier then keeps all the monies for a period of time and returns little and in one case returned none. We are talking about million's of dollars. This area needs some type of regulation.

As other types of technology develop in audiotext we find collect calls very popular by legitimate businesses who will not entertain 900 services. Your concerns about abuse are well taken, we must explore guidelines of regulations but not eliminate. We must also consider the creditably of complaints. Are these people the one's that just look for

I'm aware the committee does not endorse consumer fraud, however it's happening at a record pace.

I would respectively ask the commission to consider my two main concerns:

- 1. Do not totality elimate audiotext calls on a collect bases.
- 2. Demand carriers that provide 900 service to give at least 30 day notice of termination of any program that is not in violation of any law. Monies owed to a service bureau or IP be paid in full no later than 90 days after notice of termination.

Sincerely,

Z.E.O.